

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

RIC F. MALIK.,

Debtor.

EARL GEERTGENS AND
TAMA GEERTGENS

v.

RIC F. MALIK.,

Debtor.

Case No. 23-03241-ESL7

Chapter 7

Adversary Proceeding No. 24-00015-ESL

**CERTIFICATION OF GOOD FAITH ATTEMPTS TO
AVOID DISCOVERY MOTION**

I, Charles P. Gilmore, Esquire, of full age, hereby certify as follows:

1. I am an attorney representing Earl Geertgens and Tama Geertgens (“ETG”) in this matter, have personal knowledge of the matters stated herein and offer this Certification of Good Faith Efforts to Avoid Discovery Motion in support of ETG’s Motion to Compel Discovery (“Motion”).

2. I made several telephone calls to Debtor’s counsel Frederic Chardon Dubos, Esquire to confer on his client’s compliance with the outstanding discovery requests from November.

3. Unfortunately, we have been unable to get any response from Debtor's counsel to our efforts to obtain Debtor's compliance and avoid this Motion.

I certify under penalty of perjury the foregoing statements are true and correct.

Dated: 3/11/25

/s/ Charles P. Gilmore, Esq.
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